

BEFORE THE  
**FEDERAL COMMUNICATIONS COMMISSION**  
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Digital Television Distributed Transmission	)	MB Docket No. 05-312
System Technologies	)	
	)	
	)	
	)	

To:   The Secretary

**COMMENTS**

KJLA, LLC ("KJLA"), KVMD Licensee Co., LLC ("KVMD"), and Rancho Palos Verdes Broadcasters, Inc. ("RPVB") (KJLA, KVMD and RPVB collectively the "Joint Parties"), licensees of full-service television stations in the Los Angeles DMA, by their attorneys, hereby submit these Comments in the above-referenced rule making proceeding concerning Digital Television Distributed Transmission System Technologies ("DTS"). *See Clarification Order and Notice of Proposed Rule Making*, FCC 05-192, released November 4, 2005 ("*NPRM*"). As the licensees of small broadcast television stations serving both urban and rural communities, the Joint Parties view DTS as a promising new technology and generally support the streamlined regulatory approach proposed by the Commission in the *NPRM*. With respect to the specific issue of DTS service areas, the Joint Parties support the "DMA approach" advanced by the Coalition for DTS (the "Coalition") in the Coalition's Comments in this proceeding, or, in the alternative, the "equal service area approach" described herein. In support thereof, the Joint Parties state as follows.

Based on the many advantages of DTS set forth by the Merrill Weiss Group ("MWG") and discussed by the Commission in the *NPRM* – including DTS's ability to provide expanded

service with less interference, to provide a stronger, more uniform signal and boost indoor reception, and to achieve optimal spectrum efficiency through the use of multiple transmitters – the Joint Parties agree that DTS represents a promising technology that will advance the transition to digital television and serve the public interest. *See NPRM* at ¶¶ 10-12. As operators of small broadcast stations serving both urban and rural areas, the Joint Parties find the cost-effective features of DTS, such as the ability to use lower-power transmitters and antennas on smaller, existing towers throughout a station's service area, particularly appealing. This is especially important in a market such as Los Angeles, where there are few available transmitter sites. Also appealing is the fact that DTS will not require an investment in additional equipment for the consumer, or for broadcasters delivering signals to cable headends or satellite receive facilities. Such cost-effective improvements in DTV service will certainly help to advance the DTV transition, thereby promoting the public interest.

The public interest benefits associated with DTS technology warrant the timely and effective implementation of DTS rules. Accordingly, the Joint Parties support the Commission's proposals to confer primary regulatory status on the multiple transmitters used in DTS and to apply to DTS transmitters the same licensing requirements and technical rules as apply to DTV stations. *See NPRM* at ¶¶ 13, 28.

Further, the Joint Parties believe the public interest benefits of DTS apply to Class A and Low Power television stations as well as to Full Power stations. The Joint Parties support application of the rules governing digital LPTV stations to LPTV stations using DTS. *See NPRM* ¶¶ 35-38.

Finally, with respect to DTS service areas, the Joint Parties support the "DMA approach" discussed by the Commission in the *NPRM* and advanced by the Coalition in the Comments filed

by the Coalition in this proceeding. However, in the event the Commission rejects the DMA approach as inconsistent with localism, the Joint Parties suggest, as an alternative, that the Commission adopt an "equal service area approach." Under such an approach, stations within the same DMA will share "equal" service areas, equivalent to the service area of that station within the DMA with the greatest coverage areas and populations based upon transmission from a single transmitter. This approach would promote the Commission's commitment to localism by ensuring that large metropolitan-based stations and smaller stations serving communities outside the central community in a DMA are given equal opportunities to expand coverage through DTS. An equal service area approach would help ensure the competitiveness of smaller stations, thereby preserving the voice of small local broadcasters in the marketplace while offering expanded DTV coverage for all stations.

In sum, the Joint Parties enthusiastically support the DTS proposals set forth by the Commission in the *NPRM*, and urge the Commission to adopt the DMA approach or an equal service area approach to DTS service areas.

WHEREFORE, for the foregoing reasons, the Joint Parties generally support the DTS proposals set forth by the Commission in the *NPRM* and urge the Commission to consider a DMA approach or an equal service area approach to DTS service areas.

Respectfully submitted,

**KJLA, LLC**

**KVMD LICENSEE CO., LLC**

**RANCHO PALOS VERDES  
BROADCASTERS, INC.**

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